

***United States Court of Appeals  
for the Second Circuit***



**APPENDIX**



74-1402

IN THE

**United States Court of Appeals**  
**for the Second Circuit**

L  
P/S

No. T-3313

BARBARA WISDOM, *et al*  
*Plaintiff Appellees*

v.

NICHOLAS NORTON, *et al*  
*Defendant Appellants*

ON APPEAL FROM A DECISION OF THE  
UNITED STATES DISTRICT COURT  
DISTRICT OF CONNECTICUT

APPENDIX TO BRIEF OF APPELLANTS

ROBERT K. KILLIAN  
*Attorney General*  
30 Trinity Street  
Hartford, Connecticut

FRANCIS J. MACGREGOR  
*Assistant Attorney General*  
90 Brainard Road  
Hartford, Connecticut





## TABLE OF CONTENTS

*Page*

### PERTINENT TESTIMONY:

Testimony that Medical Witnesses Had Never Seen the Plaintiffs.....	1a
Testimony that the Plaintiff, Wisdom, was Entitled to All Medical Services for Herself and the Fetus..	2a
Testimony that the Plaintiff, Croe, was Entitled to Shelter Costs, Food and Clothing and All Medical Needs .....	3a
Testimony that City Welfare Pays for Special Diets and Vitamins.....	4a

PAGINATION AS IN ORIGINAL COPY



**TESTIMONY THAT MEDICAL WITNESSES HAD  
NEVER SEEN THE PLAINTIFFS.  
(TRANSCRIPT PAGES 10 AND 11)**

Q. Doctor, have you ever treated the plaintiff Barbara Wisdom? Have you ever looked at her?

A. No.

Q. Have you ever looked at plaintiff Jane Croe in this case?

A. No.

Q. Have you ever looked at the plaintiff Anna Tirado in this case?

A. No.

Q. So you can't say, testify at all as to what diet these women are having or anything about their gynecological problems, is that correct?

A. Correct.

**TESTIMONY THAT THE PLAINTIFF, WISDOM,  
WAS ENTITLED TO ALL MEDICAL SERVICES  
FOR HERSELF AND THE FETUS.  
(TRANSCRIPT PAGES 32 AND 33)**

Q. This woman who is pregnant now is she entitled to medical service, obstetric and gynecologic services?

A. Yes, she is.

Q. And if she had any suspicion that her child might be born with some defect would she be entitled to medical services?

A. I think —

Q. For that child? For the fetus?

A. What was the question?

Q. If Mrs. Wisdom, who is pregnant, had any worries about the fetus, that there might be some problem when that child was born, would she be entitled to medical services for those fears?

A. I think we would rely on her physician's recommendations for additional services.

Q. And if he recommended additional services would she get them?

A. Yes.



**TESTIMONY THAT THE PLAINTIFF, CROE, WAS  
ENTITLED TO SHELTER COSTS, FOOD AND  
CLOTHING AND ALL MEDICAL NEEDS.  
(TRANSCRIPT PAGES 36 AND 37)**

Q. And what's that? Is that a fixed amount?

A. Eleven dollars and 70 cents.

Q. Eleven seventy?

A. Yes.

Q. So, in other words, you allow her eleven seventy for food and clothing?

A. Additional clothing can be had upon — where need arises.

Q. But normally it's — she gets — this eleven seventy includes food and personal clothing?

A. Food and personal, yes.

Q. Household needs? Plus she's allowed a shelter allowance?

A. Shelter allowance, yes.

Q. In this case she lives with her grandmother?

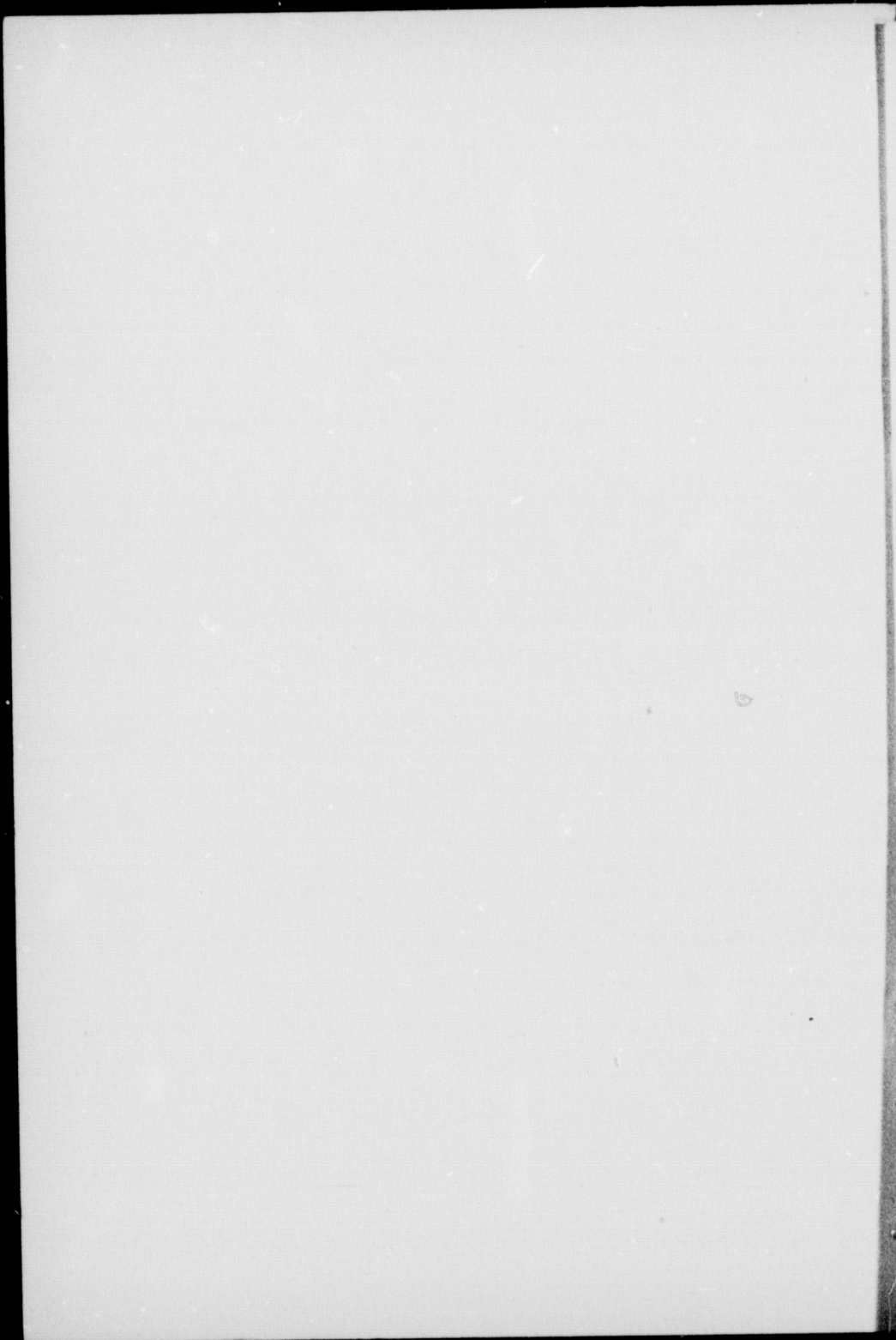
A. Half the rent is shared.

Q. She pays half the rent. Is she entitled to any pre-natal care?

A. Oh, yes, yes.

Q. Any medicine that's needed?

A. All medical needs are met.



Q. Pardon?

A. All medical needs are met.

THE COURT: What is the period of time of the \$11.70?

THE WITNESS: That's a week. That's a weekly budget we operate on.

**TESTIMONY THAT CITY WELFARE PAYS FOR  
SPECIAL DIETS AND VITAMINS.  
(TRANSCRIPT PAGE 38)**

Q. Do you know whether the city welfare department will pay for the cost of vitamins and iron supplements?

A. We can if it's recommended by a doctor as being necessary. We can allow — we have a special allowance for special diets. Again, under State standards.